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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES <i>ex rel.</i> STROM,)	No. C 05-3004 CRB (JSC)
)	
Plaintiffs,)	STIPULATION REGARDING
)	PRODUCTION OF CLAIMS DATA
v.)	AND EXPERT DISCOVERY
)	
SCIOS, INC. and)	
JOHNSON & JOHNSON,)	
)	
Defendants.)	

1 WHEREAS on December 1, 2011, the Court granted Defendants Scios Inc. and Johnson
2 & Johnson's (collectively "Defendants") motion to compel the production of inpatient and
3 outpatient claims data from Medicare, TRICARE, and FEHBP from January 1, 2001 to
4 December 31, 2007 for each patient ID number for which the government alleges a false claim
5 was submitted. (Docket No. 171).

6 WHEREAS at the December 1, 2011 hearing on Defendants' motion to compel, Judge
7 Corley instructed the parties to meet and confer in order to reach a stipulation regarding the
8 timing for production of the claims data, and a revised schedule for expert discovery.

9 WHEREAS the parties have met and conferred extensively regarding the timing for
10 production of the claims data, and a revised schedule for expert discovery.

11 WHEREAS the revised schedule for expert discovery set forth below will affect the
12 current dates for dispositive motions. Accordingly, the parties will submit a separate stipulation
13 and order to District Judge Charles R. Breyer regarding dates for dispositive motions and trial, or
14 request a Case Management Conference before him to set such dates.

15 Subject to the Court's approval, IT IS HEREBY STIPULATED AND AGREED by the
16 Parties, through their undersigned counsel of record, that:

17 1. The United States shall produce the claims data it has been ordered to produce to
18 Defendants no later than February 15, 2012.

19 2. The parties shall produce rebuttal expert reports no later than May 1, 2012.

20 3. The United States shall produce rebuttal reports responding to Defendants' experts'
21 discussion of and opinions regarding the claims data no later than June 15, 2012.

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4. The deadline for completing expert discovery shall be July 31, 2012.

IT IS SO STIPULATED.

Respectfully submitted,

TONY WEST
Assistant Attorney General

JOSHUA B. EATON
Attorney for the United States, Acting
Under Authority Conferred by 28 U.S.C. §515

Dated: 01/03/2012

By: /S/ Signature on file
SARA WINSLOW
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THOMAS R. GREEN
Assistant United States Attorneys

Dated: 01/03/2012

By: /S/ Signature on file
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NOLAN & AUERBACH, P.A.
LAW OFFICES OF MATTHEW PAVONE

Dated: 12/31/2011

By: /S/ Signature on file
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Pro Hac Vice
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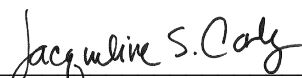
Dated: 01/03/2012

By: /S/ Signature on file
JOHN POTTER, Esq.
DIANE DOOLITTLE, Esq.
NICOLE ALTMAN, Esq.
Attorneys for Defendants Scios, Inc. and
Johnson & Johnson Inc.

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: January 3, 2012



JACQUELINE SCOTT CORLEY
United States Magistrate Judge